

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FRANK SACO,  
Plaintiff,

v.

CIVIL ACTION

NO.

03-12551-MBB

TUG TUCANA CORPORATION,  
Defendant.

DEFENDANT'S SUPPLEMENTAL INSTRUCTION TO THE JURY

NEGLIGENCE

A shipowner in a Jones Act case has a duty to warn his employees "in an effective way of dangers not reasonably known." In other words, shipowners need not warn seamen of dangers that are "open and obvious."

*Patterson v. Allseas USA, Inc.*  
137 Fed.Appx. 633, 2005 A.M.C. 1811

By its attorneys,

CLINTON & MUZYKA, P.C.

"/s/Thomas J. Muzyka"

Thomas J. Muzyka

BBO NO. 365540

Terence G. Kenneally

BBO NO. 642124

One Washington Mall

Suite 1400

Boston, MA 02108

(617) 723-9165

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